

REMARKS

Claims 6, 8-10, 16, 18-20, and 25-31 are pending in the application and have all been rejected. Claims 26, 28, 29 and 31 are amended, but no new matter is introduced. Entry of these amendments is respectfully requested as it is not believed that they necessitate a new search, but merely address informalities and/or "clean up" the claim language. Moreover, as discussed in more detail below, another Office Action is respectfully requested at least because not all of the limitations in the claims have been examined. For example, claims 30 and 31, which were added in the 7/27/09 Reply to the 4/29/09 Non-Final OA and which were acknowledged in the "Response to Arguments" section on page 2 of the 9/11/09 Final OA were not examined in the 9/11/09 Final OA. Additionally, the limitation of transliteration through an intermediary language in independent claims 6 and 16 is not examined in the 9/11/09 Final OA. It is thus respectfully submitted that the finality of this Office Action is improper. It is to be appreciated that while reference may be made back to certain parts of the application in this Reply (e.g., page numbers, line numbers, Figs., etc.), that such referencing is not to be interpreted in a limiting manner (e.g., to limit the scope of the claims and/or features therein to the particular portion(s) referenced), but is instead merely done for purposes of explanation, illustration and/or ease of understanding. Reconsideration of the application in light of the following remarks is respectfully requested.

I. REJECTION OF CLAIMS 6, 8-10, 16, 18-20, AND 25-29 UNDER 35 U.S.C. §103(a)

Claims 6, 8-10, 16, 18-20, and 25-29 are rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over Janakiraman et al., U.S. Patent No.: 7,369,986 (*hereinafter* "Janakiraman") in view of Bruso et al. U.S. Patent No.: 5,649,214 (*hereinafter* "Broso"). Withdrawal of this rejection is respectfully requested for at least the following reasons.

Independent claims 6 and 16 provide for, among other things, receiving a text string in a first alphabet of a first language **on an input** of a computing device. It is respectfully submitted that neither Janakiraman nor Bruso, alone or in combination, teach this feature. For example, Janakiraman merely teaches selecting a preexisting phrase that can be translated, where the selection merely activates the translation mechanism, but not that the phrase is entered on an input of a computing device (e.g., by typing on a keyboard).

By way of example, Fig. 6 of Janakiraman illustrates that the text string that is transliterated is not received on an input of the computing device. Rather, the transliteration module 610 receives a document 602 and one or more input messages 604, 606, 608. The document 602 (e.g., an html page) "preferably includes **text in one or more Indian languages**" (see, e.g., Fig. 4C). A user of the computing device "may click and drag over a phrase [from the document 602] and double-click to activate the transliteration mechanism" (col. 7, lines 7-9, 18-20). Thus, the text string (e.g., Indian phrase) that is transliterated is preexisting in the document 602 and is not received on an input of a computing device as provided in claims 6 and 16. Rather, what is received on an input of a computing device is merely a "selection" input that simply **activates** the transliteration module 610 (see col. 7, lines 10-24).

By way of further example, Fig. 4C of Janakiraman illustrates that the text (e.g., Indian phrase) that is being translated, or transliterated, is text from an html page, for example, that is loaded onto a browser window. Thus, while a user can select a word or phrase to be transliterated, the selected text is not "received . . . **on an input** of the computing device" (e.g., on a keyboard) as provided in independent claims 6 and 16. That is, a user does not "textually" enter the phrase to be translated (e.g., by typing on a keyboard), rather a user can merely "hover over", "click on" and/or otherwise select a preexisting phrase for translation.

Independent claims 6 and 16 also provide for, among other things, converting a text string to a **phonetic string** in a second alphabet **of an intermediary language**, based on a first predefined **phonetic mapping scheme** between the first alphabet and the second alphabet. It is respectfully submitted that neither Janakiraman nor Bruso, alone or in combination, teach this feature. The Final Office Action alleges that Figs. 4A-4E and col. 6, lines 7-20 of Janakiraman provide for converting a text string to a phonetic string in a second alphabet, based on a first predefined phonetic mapping scheme between the first alphabet and the second alphabet. However, Janakiraman defines transliteration to mean "mapping from one script into another [(e.g., a second script)]. The transliteration is preferably lossless. In other words, the informed reader should be able to reconstruct the original spelling of unknown transliterated words" (col. 2, lines 57-61). Figs. 4A-4E help to further illustrate what Janakiraman means by the term "transliteration." An Indian term, for example, can be selected and transliterated, letter-by-letter if possible, into English characters. As shown in Fig. 4C, the text string that is ultimately derived may not have meaning in the English language, and it is unclear from Janakiraman whether the second script is derived based upon a **phonetic mapping scheme** as provided in claims 6 and 16. That is, it is unclear whether the English characters that are derived from the Indian text string, for example, are output from the transliteration mechanism because they are phonetically similar to the characters in the Indian text string.

It is respectfully submitted that Bruso fails to make up for the aforementioned deficiencies of Janakiraman with regard to claims 6 and 16. Independent claims 6 and 16 and the remaining rejected claims that depend therefrom are thus believed to be allowable over the suggested combination, and withdrawal of this rejection is therefore respectfully requested.

Additionally, while the Final Office Action alleges that Janakiraman teaches converting a text string to a phonetic string in a second alphabet, the Final Office Action concedes that "Janakiraman does not disclose transliteration **through an intermediary language**," (page 5) which is provided for in independent claims 6 and 16. The Final Office Actions alleges that Bruso discloses converting a phonetic string into a third alphabet based on a second predefined phonetic mapping scheme, but does not allege that Bruso teaches what Janakiraman admittedly lacks, namely converting a text string to a phonetic string in a second alphabet **of an intermediary language**. The 9/11/09 Final Office Action further fails to provide any other reference that may teach this element, and thus this limitation was not examined in the 9/11/09 Final OA. Similarly, independent claim 30 and dependent claim 31 were not examined in the 9/11/09 Final OA, even though their addition by way of the 7/27/09 Reply to the 4/29/09 Non-Final OA was acknowledged in the "Response to Arguments" section on page 2 of the 9/11/09 Final OA. It is thus respectfully submitted that the finality of the 9/11/09 Office Action is not proper at least because each and every element of the claims were not examined. Withdrawal of the finality of the 9/11/09 Office Action and an additional Office Action is therefore respectfully requested.

II. CONCLUSION

For at least the above reasons, the claims currently under consideration are believed to be in condition for allowance.

Should the Examiner feel that a telephone interview would be helpful to facilitate favorable prosecution of the above-identified application; the Examiner is invited to contact the undersigned at the telephone number provided below.

Should and fees be due as a result of the filing of this response, the Commissioner is hereby authorized to charge the Deposit Account Number 50-5088, **306213.01**.

Respectfully submitted,
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